

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

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EDWARD T. KENNEDY,

Plaintiff,

v.

EQUIFAX, INC., et al.

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Defendants.

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No. 18-cv-00214-JLS

**DEFENDANT STEVEN CRAIG LEMASTERS'**  
**MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(5), Defendant Steven Craig LeMasters ("LeMasters") hereby moves for the dismissal of Plaintiff Edward T. Kennedy's ("Kennedy") First Amended Complaint for lack of personal jurisdiction and insufficient service of process.

LeMasters respectfully requests entry of an Order, substantially in the form enclosed herewith, dismissing Kennedy's First Amended Complaint as against LeMasters, with prejudice. Kennedy is serial litigant intent on abusing the civil justice system for the purposes of harassing LeMasters. His claims have no basis in fact or law, and he must not be permitted to continually reiterate them at the expense of LeMasters and this Court.

In support of his Motion, LeMasters incorporates his Memorandum of Law contemporaneously filed herewith in its entirety.

Respectfully submitted,

By: /s/ Joshua Upin

Dated: October 23, 2018

Joshua Upin, Esquire

Matthew Faranda-Diedrich, Esquire

Alexander J. Nassar, Esquire

PA Id. Nos. 308459/203541/313539

**ROYER COOPER COHEN BRAUNFELD LLC**

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*Attorneys for Defendant Steven Craig LeMasters*